

Comments on petition:  
RM-10806  
Frank W. Napurano  
K2OKA

#### Petition Specific Comments

The following comments by the petitioner of RM-10806 are worth noting:

"Morse Code is universal". Morse code is indeed universal across cultural, ethnic and country boundaries, a common bond between Amateur Radio operators worldwide, helping to promote goodwill among the diverse background of Amateurs around the globe.

Other comments in the petition about Morse code being the purest form of communications, reliable and the importance of Morse code to Amateur Radio are all relevant to retaining Morse code as a testing requirement.

#### General Comments

I support retaining Morse code as a testing requirement for Amateur Radio licenses within the United States of America. Morse code is still an integral part of Amateur Radio and is widely used by many people.

As Section Manager for the ARRL in the Western New York section, I conducted a survey of approximately 300 Amateurs. A full seventy percent 70% support retaining Morse Code as a testing requirement in the USA. Over sixty percent (60%) of those who are no-code licensees (Technician) support keeping Morse Code as a testing requirement.

As a compromise solution I propose changing the operating privileges of the Technician license class to include limited voice and Morse code frequency allocations in the 1.8 to 30MHz Amateur bands, and retain the 5 word per minute Morse code examination for both the General and Extra class licenses. A combination of Novice and Technician privileges for the no-code Technician license has merit.

As a W5YI and ARRL volunteer examiner, Morse code is not a testing burden as some claim, since there is only one test to administer for all license classes that require the test.

The argument that other commercial and military services have dropped Morse code is of no relevance to Amateur Radio, since these services are distinctly different with different obligations and requirements, and this premise should be dismissed as irrelevant to Amateur Radio.

Organizations such as the ARRL, W5YI and all others within the NCVEC, have a direct or indirect pecuniary interest in dropping the Morse code testing requirement, and therefore any petition from these organizations or including these organizations should be reviewed carefully. Some of the organizations within the NCVEC have employment concerns and therefore present an unfortunate conflict

of interest for these organizations.

Other organizations within the NCVEC stand to benefit monetarily from the greater number of Amateurs expected by eliminating Morse code.

Eliminating Morse code to make more money or to gain membership is not an adequate reason for making a change in the Morse code requirements.

The Federal Communications Commission FCC must not let Amateur Radio turn into another citizen's band. The FCC while having good intentions at the time with the technology of the time, created a monster in allowing a citizen's band to be created in the 26 to 27 MHz spectrum. The citizen's band is an embarrassment to the FCC and to the USA and cannot be repeated by eliminating the Morse code requirement for Amateur Radio.

#### Summary

Keeping Morse code as a testing requirement for the General and Extra class licenses is consistent with the desire of the majority of Amateur Radio operators in the United States.

Petition RM-10806 by Frank W. Napuranon, K2OKA has merit and is in-line with the wishes of the majority of Amateurs to retain Morse code as a testing requirement.

Respectfully,

Scott Bauer W2LC  
ARRL Section Manager for Western New York  
W2LC@arrl.org or W2LC@ix.netcom.com